

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

COMPLETE BUSINESS SOLUTIONS GROUP)	
, Inc. , BROADWAY ADVANCE, LLC and)	
FAST ADVANCE FUNDING, LLC)	
	Plaintiffs	Civil Action No. 2:18-cv-04013-PBT
vs)	
)	
RADIANT IMAGES, INC. and)	
GIANNA WOLFE)	
	Defendants	REQUEST FOR JUDICIAL NOTICE UNDER RULE 201 FEDERAL RULES OF EVIDENCE

Plaintiffs, Complete Business Solutions Group, Inc., Broadway Advance, LLC, and Fast Advance Funding, LLC hereby put this Court on Judicial Notice of this Court's ruling in the cases (2:17-cv-04069-CDJ Complete Business Solutions Group, Inc. vs. Suess, et al. and 2:17-cv-04622-CDJ Suess vs. Complete Business Solutions Group, Inc. which have bearing on the Defendants' Motion to Open/Strike the Judgment entered by Confession. The terms of the underlying contracts giving rise to these actions are essentially the same. In these actions, the client for Defendant's counsel was also seeking the application of California law to these Factoring Agreements.

The Honorable C. Darnell Jones, U.S.D.J. in both of the aforementioned rulings found that it was the clear intention of the parties to apply Pennsylvania or New York law to the Factoring Agreements and that the choice of law/choice of forum provisions of the contracts between the parties were upheld. Judge Jones further stated that the underlying Factoring Agreements were not in breach of any New York or Pennsylvania laws. (See Exhibits “A” and “B” for copies of said rulings). Note that both rulings are presently subject to Motions for Reconsideration filed by counsel for Plaintiffs in this matter.

Respectfully Submitted,

/S/ Norman M. Valz

Norman M Valz, Attorney for Plaintiffs

CERTIFICATE OF SERVICE

Pursuant to the Federal Rules of Civil Procedure, the preceding document has been served upon all parties through their counsel through the ECF system on the date of this filing.

Respectfully,

/S/ Norman M. Valz

Norman M. Valz